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February 17, 2016

**Via ECF and E-mail**

Hon. Richard J. Sullivan

United States District Court

Southern District of New York

40 Foley Square, Room 2104

New York, NY 10007

SullivanNYSDChambers@nysd.uscourts.gov

Re: Pirate Brands, LLC v. Robert Ehrlich, Sexypop Popcorn, LLC, and RAGF, Inc.

Dear Honorable Sullivan,

We represent Respondents Robert Ehrlich, Sexypop Popcorn, LLC and RAGF, Inc. (collectively "Respondents") in the above referenced matter. This letter is in response to the Proposed Judgment filed by Petitioner Pirate Brands, LLC ("Pirate Brands") on February 16, 2016.

Respondents respectfully oppose the Proposed Judgment. The Proposed Judgment asks the Court to grant and award Petitioner attorneys' fees, costs, and expenses that were not granted in the JAMS Streamlined Arbitration Award rendered on September 4, 2015. Specifically, Petitioner asks this Court to grant attorneys' fees, costs and expenses incurred in this confirmation proceeding in the amount of \$39,113.60. The JAMS Streamlined Arbitration Award does not extend to this confirmation proceeding, nor does it grant Petitioners future attorneys' fees, costs, and expenses in its effort to confirm this award. It very clearly states that:

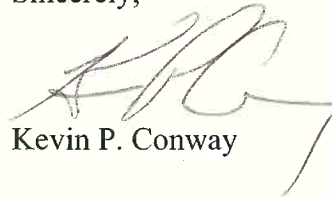
**18. Claimant's Application for Final Approval of Attorneys' Fees, Expenses and Other Costs, is granted to the extent that the Claimant is awarded \$246,872.13 for its reasonable attorneys' fees and \$34,836.48 for its costs and expenses, and otherwise the application is denied.**

As is evident, this does not include the future expenses and costs incurred in this confirmation proceeding. Accordingly, Respondents submit and attach herewith an amended Proposed Judgment, which removes the following language:

**8. Petitioner's request for the attorneys' fees, costs, and expenses incurred in this confirmation proceeding is GRANTED and AWARDED against Respondents jointly and severally in the amount of \$39,113.60.**

If you should have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Kevin P. Conway

**CC: Via Email**

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Encl.